

EXHIBIT 15

Excerpts from Deposition Transcript Vol. I of Abigail Panter

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR
ADMISSIONS, INC.,

Plaintiffs,

vs.

UNIVERSITY OF NORTH
CAROLINA, et al.,

Defendants.

AMENDED DEPOSITION
OF
ABIGAIL PANTER

THIS DEPOSITION CONTAINS HIGHLY CONFIDENTIAL AND
PROPRIETARY INFORMATION AND IS SUBJECT TO A PROTECTIVE
ORDER RESTRICTING PUBLIC DISCLOSURE OF ITS CONTENTS

TAKEN AT THE OFFICES OF:
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL
110 Bynum Hall
222 East Cameron Avenue
Chapel Hill, NC 27514

06-19-17
9:08 A.M.

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1 about the Provost Dean?

2 A. "Provost Dean said that the University
3 is obligated by law to consider alternatives to
4 any use of race or ethnicity in its admissions
5 policies and practices. He also said that the
6 University is obligated both legally and as a
7 matter of sound practice to assess, measure, and
8 improve its delivery of educational benefits to
9 its students, including the educational benefits
10 of diversity."

11 Q. Thanks. How does UNC assess and measure
12 its delivery of educational benefits to its
13 students including the educational benefits of
14 diversity?

15 A. Well, first off all, the student body
16 diversity is critical to our mission for the
17 University as I've mentioned before, since we're a
18 center for scholarship and research and creativity
19 and we teach undergraduates, graduate students,
20 and professional students.

21 Having a diverse student body allows us
22 to have discussions of students together talking
23 about issues, thinking about different
24 perspectives and -- and improves our learning
25 outcomes. And as such we look at our learning

1 outcomes in a lot of different ways.

2 We have a process where we examine
3 regularly our student learning outcomes of our
4 University at regular points, including
5 examination of whether the benefits of -- of
6 racial -- of racial and student diversity at the
7 University. So at -- for example, at the
8 undergraduate level we have surveys. We -- that
9 are asked regularly that cover aspects of the
10 benefits of diversity.

11 We also talk to our students regularly
12 about -- about their experiences and about -- and
13 whether they're being supported and how their
14 academic careers are going. We talk to them in
15 advising. We talk to them in our student support
16 areas and we are talking to students regularly.

17 My own research also involves talking to
18 students regularly about their paths through
19 Carolina, in their transitions coming to UNC, in
20 their career while here and their experiences and
21 as they approach graduate school or post-graduate
22 opportunities.

23 Q. Okay. So I have a couple questions
24 about that. You mentioned that this -- that UNC
25 examines student learning outcomes. What do you

1 mean by that?

2 A. I mean that we have expectations and --
3 that our students will gain something while
4 they're here in many different areas. So we have,
5 for example, a general education curriculum that
6 all of our undergraduate students are engaged with
7 while they're here and there are certain aspects
8 to that so we look, for example, they have to have
9 quantitative reasoning and they have to have
10 certain -- they have to have writing and they have
11 to have certain foreign language competency and
12 other areas. And one of them that we look at is
13 around whether students gain something from having
14 a diverse environment.

15 Q. And how do you evaluate whether the
16 students have gained something from having a
17 diverse environment?

18 A. Well, usually there are many different
19 methods so it's important to triangulate and use
20 different kinds of assessments to look at these
21 kinds of questions, which is why we use surveys
22 and we talk to students and we do a lot of kinds
23 of ways to get at the question about what students
24 are gaining from this experience.

25 But surveys get -- surveys have

1 information about students when they came in, what
2 -- what their understanding was of race and
3 ethnicity and what it is now as they're graduating
4 and those changes. We see that in -- we have
5 software surveys as well that do that so we have
6 certain surveys that we regularly ask that get at
7 those kinds of questions.

8 Q. Okay. And so what -- what do those
9 surveys ask?

10 A. They ask a series of questions, some of
11 which involve the question that's here about
12 student body diversity and they ask in different
13 areas, when you came in, about your understanding
14 of race and ethnicity, your understanding of
15 gender, your understanding of other -- other areas
16 and what is your understanding now and how is --
17 really how has the University improved your
18 understanding of these areas?

19 Q. Okay. And ---

20 A. That's called an indirect way of
21 assessing student body diversity.

22 Q. Okay. And you said this is done by
23 surveys?

24 A. Yes, those are some surveys.

25 Q. And who conducts these surveys?